

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAWMAN ARMOR CORPORATION,	:	
	:	
Plaintiff,	:	Case No. 2:02-CV-04595-RK
	:	
v.	:	Judge Robert Kelly
	:	
WINNER INTERNATIONAL, LLC,	:	
	:	
Defendant.	:	
	:	

DECLARATION OF PHILIP J. MOY JR.

Being duly sworn, I, Philip J. Moy Jr., hereby state as follows:

1. I am an attorney with the firm of Fay, Sharpe, Fagan, Minnich & McKee, LLP, located at 1100 Superior Avenue, Seventh Floor, Cleveland, Ohio 44114-2579. I represent the defendant in the captioned action (hereinafter referred to as "Winner"). I am a member in good standing of the Bar of the State of Ohio and have been admitted to appear as counsel *pro hac vice* for Winner in this action.

2. I am submitting this declaration to provide certain information to the Court in support of Winner's motion for summary judgment of non-infringement.

3. Attached as Exhibit A to this declaration is a true copy of U.S. Patent No. 5,107,692, which issued on April 28, 1992 and is entitled "Automobile Steering Wheel Lock." This patent is referred to as "Chen '692" in Winner's memorandum supporting its motion for summary judgment of non-infringement.

4. Attached as Exhibit B to this declaration is a true copy of U.S. Patent No. 5,031,428, which issued on July 16, 1991 and is entitled "Two Stage Automobile Steering Lock."

5. Attached as Exhibit C to this declaration is a true copy of U.S. Patent No. 5,042,278, which issued on August 27, 1991 and is entitled "Automobile Steering Lock Having Rods Anti-Releasing Mechanism."

6. Attached as Exhibit D to this declaration is a true copy of U.S. Patent No. 5,778,709, which issued on July 14, 1998 and is entitled "Vehicle Steering Wheel and Air Bag Antitheft Locking Apparatus." This patent is referred to as "Hsu '709" in Winner's memorandum supporting its motion for summary judgment of non-infringement.

7. Attached as Exhibit E to this declaration is a copy of pages from a Web site accessible in September 2002 at the URL <http://www.keenaa.com>. The pages refer to a company named Keen Auto Parts & Accessories, Inc., of Tainan, Taiwan and show among other things, a product sold under the "Elephant Lock" designation.

8. Attached as Exhibit F to this declaration is a true copy of U.S. Patent No. 5,197,308, which issued on March 30, 1993 and is entitled "Steering Wheel Security Device." This patent is referred to as "Pazik '308" in Winner's memorandum supporting its motion for summary judgment of non-infringement.

9. Attached as Exhibit G to this declaration is a true copy of U.S. Patent No. 5,299,438, which issued on April 5, 1994 and is entitled "Automobile Steering Lock." This patent is referred to as "Chen '438" in Winner's memorandum supporting its motion for summary judgment of non-infringement.

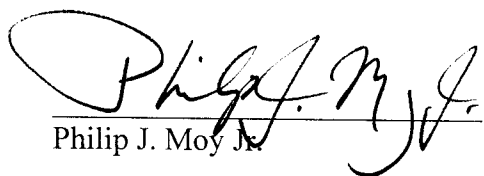
10. Attached as Exhibit H to this declaration is a true copy of U.K. Patent Specification No. 1,127,524, which was published on September 18, 1968 and is entitled "A Motor Vehicle Anti-Theft Device."

11. Attached as Exhibit I to this declaration is a true copy of U.S. Patent No. 5,024,069, which issued on June 18, 1991 and is entitled "Anti-Theft Locking Apparatus for Steering Wheels."

12. Attached as Exhibit J to this declaration is a true copy of U.S. Patent No. 5,052,201, which issued on October 1, 1991 and is entitled "Automobile Steering Wheel Lock."

13. Attached as Exhibit K to this declaration is a true copy of U.S. Patent No. 5,199,284, which issued on April 6, 1993 and is entitled "Lock Device for a Steering Wheel in an Automobile."

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed by me on September 16, 2003, at Cleveland, Ohio.


Philip J. Moy Jr.